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Via ECF

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Honorable Cathy Seibel
United States District Court
Southern District of New York

Re: *Soo Ja Cho v. Costco Wholesale Corporation*
Index No.: 7:21-CV-06786(VS)
Pre-motion letter

Dear Judge Cathy Seibel:

As far as I can tell, the cutoff for all discovery (fact and expert) was over 8 months ago. The parties can take whatever discovery they want by agreement between now and the November 15 conference, but I expect to schedule motion practice or trial at that conference.


SO ORDERED.


CATHY SEIBEL, U.S.D.J.

11/1/22

Our offices represent Plaintiff, Soo Ja Cho, in the reference matter. Please, accept this as a pre-motion letter in response to the Notice of Court Conference dated October 18, 2022, indicating that any pre-motion letter should be submitted by November 1, 2022. In the present matter, Defendant's attorney confirmed that Costco have no video of the accident suffered by the Plaintiff, Soo Ja Cho, when she fell on the inside of the store premises. Even though there is still pending discovery, including depositions. Plaintiff anticipates that it will file a motion for spoliation in this case.

Respectfully,


Christopher Gladd